



National Institutes of Health
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September 4, 2009

Dr. Christine Augustyniak
U.S. National Coordinator for the
OECD Test Guidelines Program
U.S. Environmental Protection Agency
Ariel Rios Building, Mail Code 7509P
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Dear Dr. Augustyniak:

We are responding to a notification from OECD requesting public comments on the proposed OECD *Draft Guidance Document on Using Cytotoxicity Tests to Estimate Starting Doses for Acute Oral Systemic Toxicity Tests*, with a requested deadline of September 4, 2009. The Interagency Coordinating Committee on the Validation of Alternative Methods (ICCVAM) Acute Toxicity Working Group (ATWG) is pleased to provide editorial and formatting comments on this document. We are responding on behalf of the ICCVAM and the ATWG to express their support for the Guidance Document.

We ask that you forward these comments to the OECD Secretariat for consideration by the member countries as part of the U.S. position on this document. If for some reason you propose to not agree with any of the comments as part of the U.S. position, we ask that we have the opportunity to discuss the U.S. position with you before it is finalized. We also ask that you share with us any other U.S. comments that were provided so that we can make them available to ICCVAM and the ATWG.

We believe that expeditious adoption of this proposed Guidance Document will increase awareness and use of these *in vitro* cytotoxicity test methods by OECD member countries. This should help further reduce and refine animal use for acute oral toxicity testing. Please feel free to contact us at any time if you have questions about the comments.

Sincerely,

William S. Stokes, D.V.M., D.A.C.L.A.M.
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Enclosures

cc:
ICCVAM and the ICCVAM Acute Toxicity Working Group
Joachim Kreysa, ECVAM
Hajime Kojima, JaCVAM
David Blakey, Health Canada